IN THE UNITED STATES BANKRUPTCY COURT FOR THE WESTERN DISTRICT OF PENNSYLVANIA

In re:

Pittsburgh Corning Corporation,

Debtor(s)

Chapter 11

Related to Doc. No. 9260

In re:

North American Refractories

Company, et al.

Debtor(s)

Bankruptcy No. 02-20198-JKF

Bankruptcy No. 00-22876-JKF

Chapter 11

Related to Doc. No. 7835

In re:

Mid-Valley, Inc., et al. and

DII Industries LLC

Debtor(s)

Bankruptcy No. 03-35592-JKF (CLOSED)

Chapter 11

Related to Doc. No. 2839

IN THE UNITED STATES BANKRUPTCY COURT FOR THE DISTRICT DELAWARE

In Re:

Owens Corning, et al.,

Debtor(s)

Bankruptcy No. 00-3837-JKF (CLOSED)

Chapter 11

Related to Doc. No. 21068

W.R. Grace & Co., et al.

Debtor(s)

Bankruptcy No. 01-1139-JKF

Chapter 11

Related to Doc. No. 30404

USG Corporation, et al.,

Debtor(s)

Bankruptcy No. 01-2094-JKF (CLOSED)

Chapter 11

Related to Doc. No. 12682

United States Mineral Products Company,

et al.

Bankruptcy No. 01-2471-JKF (CLOSED)

Chapter 11

Related to Doc. No. 3989

Kaiser Aluminum Corporation, et al.

Debtor(s)

Debtor(s)

Bankruptcy No. 02-10429-JKF

Chapter 11

Related to Doc. No. 10275

The Flintkote Company Bankruptcy No. 04-11300-JKF

Debtor(s) Chapter 11

Related to Doc. No. 7436

Armstrong World Industries, Inc., et al. Bankruptcy No. 00-4471-JKF (CLOSED)

Debtor(s) Chapter 11

Related to Doc. No. 10782

ACandS, Inc., et al. Bankruptcy No. 02-12687-JKF (CLOSED)

Debtor(s) Chapter 11

Related to Doc. No. 3721

Combustion Engineering, Inc. Bankruptcy No. 03-10495-JKF (CLOSED)

Debtor(s) Chapter 11

Related to Doc. No. 3476

AFFIDAVIT OF JAMES P. WEHNER

James P. Wehner, being first duly sworn, deposes and says:

- 1. I am one of counsel for the Official Committee of Asbestos Personal Injury Claimants (the "ACC") in *In re Garlock Sealing Technologies LLC*, No. 10-31607 (Bankr. W.D.N.C.) (the "NCWB Proceeding"). I make this affidavit pursuant to the Order Establishing the Protocol for Production of 2019 Exhibits (the "2019 Protocol Order"), entered in the above-captioned cases. Capitalized terms not otherwise defined herein shall have the meaning assigned in the 2019 Protocol Order.
- 2. This affidavit is based on my personal knowledge, and my inquiries of employees of Caplin & Drysdale, and other agents, attorneys, and experts of the ACC.
- 3. In 2013, my law firm, Caplin & Drysdale, Chartered, received the 2019 Exhibits on behalf of the ACC.

- 4. I attest that the ACC, and their employees, agents, attorneys, and experts, to the extent they had access to the 2019 Exhibits, used the 2019 Exhibits solely for the purpose of the NCWB Proceeding and, in particular, used the 2019 Exhibits solely in connection with the proceeding to estimate mesothelioma claims against Garlock (the "Estimation Proceeding"). Moreover, the 2019 Exhibits were never used in evidence in the Estimation Proceeding.
- 5. I further attest that the ACC, and their employees, agents, attorneys, and experts did not share or distribute any of the 2019 Exhibits (in whole or in part) with any person or entity except as expressly authorized by an order of the Bankruptcy Court for the Western District of North Carolina ("NCWB"), the Bankruptcy Court for the District of Delaware ("DEB"), or the Bankruptcy Court for the Western District of Pennsylvania ("PAWB"). Because the 2019 Exhibits were not used in the Estimation Proceeding, the materials were never further distributed.
- 6. I also attest that ACC, and their employees, agents, attorneys, and experts did not and will not publicly disclose the identity of any individual listed in any of the 2019 Exhibits except as was expressly authorized by an order of NCWB, DEB, or PAWB.
- 7. I additionally attest that the ACC, and their employees, agents, attorneys, and experts, to the extent they received copies of 2019 Exhibits, have retrieved, collected, and permanently destroyed all copies of the 2019 Exhibit Production, including any and all subparts or subsets, regardless of whether any or all of the 2019 Exhibit data was merged with any other data.

This \coprod day of September, 2017.

James P. Wehner

CAPLIN & DRYSDALE, CHARTERED

One Thomas Circle, N.W.

Suite 1100

Washington, DC 20005

(202) 862-5000

jwehner@capdale.com

Counsel for the Official Committee of Asbestos Personal Injury Claimants

Sworn to and subscribed before me, this ____ day of September, 2017.

Notary Public

My commission expires:

(Official Seal)

Beverly Ann Taylor Notary Public, District of Columbia My Commission Expires 1/31/2021

